

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF TEXAS  
HOUSTON DIVISION

IN RE:	§	
NONJUDICIAL CIVIL FORFEITURE	§	
PROCEEDING INVOLVING	§	MISC. CASE NO.:
APPROX. 12,629 AUTO PARTS	§	

UNOPPOSED MOTION TO EXTEND TIME  
UNDER 18 U.S.C. § 983(a)(3)(A)

The United States, by the United States Attorney for the Southern District of Texas, as authorized by 18 U.S.C. § 983(a)(3)(A), moves the Court to extend the time in which the United States is required to file a complaint for forfeiture and/or to obtain an indictment alleging forfeiture from November 23, 2022 to February 21, 2023.

The United States represents to the Court as follows:

1. On May 25, 2022, agents with Homeland Security Investigations (“HSI”) executed a federal search warrant at Trans World Services (“TWS”), a commercial entity, located in Houston, Texas, 77025 for violations of 18 U.S.C. §§ 2320 (Trafficking of Counterfeit Goods), 1341 (Mail Fraud) and 1956 (Money Laundering).
2. During the search, approximately 12,629 auto parts, as listed in Attachment A, were seized from TWS. These auto parts will be herein collectively referred to as “the property”.
3. Following the seizure, HSI initiated administrative forfeiture proceedings against the property. All of the written notice of intent to forfeit required by 18 U.S.C. § 983(a)(1)(A) to be sent by HSI to interested parties has been sent.
4. The time has expired for any person to file a claim to the property under 18 U.S.C. § 983(a)(2)(A)-(E).

5. On or about August 25, 2022, HSI received a claim filed by TWS, through its president and sole shareholder, Mohammad Hanif Samana (“the claimant”) to the property in a nonjudicial civil forfeiture proceeding against the property.
6. Upon receiving the claim, HSI transmitted the claim to the United States Attorney for the purpose of initiating a judicial forfeiture action against the property.
7. Under 18 U.S.C. § 983(a)(3)(A), the United States is required to file a complaint for forfeiture against the property and/or to obtain an indictment alleging that the property is subject to forfeiture no later than November 23, 2022.
8. The United States and the claimant have reached an agreement under 18 U.S.C. § 983(a)(3)(A), to extend the 90-day deadline to file a complaint for forfeiture and/or to obtain an indictment alleging forfeiture with the intent to engage in settlement negotiations. A proposed Order Extending Time is attached to this Motion.

#### Conclusion

Based upon the agreement of the parties to extend the time, the United States respectfully requests that the Court extend the period in which the United States is required to file a complaint against the property and/or to obtain an indictment alleging that the property is subject to forfeiture to and including February 21, 2023.

Respectfully submitted,

JENNIFER B. LOWERY  
UNITED STATES ATTORNEY

By: /s/ Yifei Zheng

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**CERTIFICATE OF CONFERENCE**

Mr. Scott Johnston, Counsel for TWS/Mohammad Hanif Samana, has been contacted and he does not oppose the Court extending the period in which the United States is required to file a complaint against the property and/or to obtain an indictment alleging that the property is subject to forfeiture to and including February 21, 2023.

*s/ Yifei Zheng*  
YIFEI ZHENG  
Assistant United States Attorney

**CERTIFICATE OF SERVICE**

A true and correct copy of this document was served on all counsel via electronic court filing and via email on November 14, 2022.

*s/ Yifei Zheng*  
YIFEI ZHENG  
Assistant United States Attorney